

REMARKS

In response to the Office Action dated December 26, 2007, Applicants submit the above noted amendments and the following remarks, entry and consideration of which is respectfully requested. Applicants submit that the above noted amendments do not introduce any new matter, and further, each of the above-noted amendments merely clarifies or removes typographical errors from the claims. As such, Applicants submit that the above noted amendments have not been made in response to any substantive prior art rejection, and therefore, each claim submitted herein is entitled to its full scope of equivalents.

Turning to the substance of the Office Action, claims 522-619 were pending in the present application as of the issuance of the Office Action, however, the Office Action has taken the position that claims 522 through 619 contain six independent inventions. Therefore, the Examiner has required Applicants to elect one of the six inventions for prosecution in the current application. The Examiner has grouped the six inventions as follows:

- Group I. Claims 522-581, 596, and 600-613;
- Group II. Claims 582-591, 597, 614, and 615;
- Group III Claims 592-594, and 618;
- Group IV 595 and 616;
- Group V 598 and 617; and
- Group VI 599 and 619.

In response to the restriction requirement, Applicants hereby elect Group I (claims 522 - 581, 596, and 600-3613), with traverse. Applicants have canceled all non-elected claims from consideration (all claims not included in Group I), without prejudice or disclaimer. However, Applicants expressly reserve the right to file a continuation or

divisional applications directed to any non-elected claims at any time during the pendency of the present application or any application claiming priority to the present application.

Additionally, Applicants respectfully traverse the restriction on grounds that the Examiner has not established a *prima facie* case for restricting the claims in the present application. More particularly, the Patent Office has expressly stated that in situations where the search and examination of claims that an application can be made without serious burden to the Examiner, the Examiner must examine the claims on the merits, even though they include claims which may be directed to independent or distinct inventions. (See, MPEP §803).

Additionally, in attempting to support the restriction requirement, the Examiner has taken the position that the claims of Groups I-VI lack the same or corresponding special technical features, however, Applicants submit that this conclusion is erroneous. For example, in supporting the restriction requirement, the Examiner notes that a fluid injector is not related to the expansion system, when in actuality at least one embodiment of the expansion system described in Applicants' disclosure utilizes a fluid injection system to drive expansion process. Similarly, a gripper may generally be used in the process of cutting a tubular, and an actuator or fluid injector may generally be used in expanding a tubular. Applicants submit that these examples illustrate that the restriction does not meet the *prima facie* requirements, and as such, reconsideration and withdrawal of the researcher requirement is respectfully requested, especially in view of the lack of search burden placed upon the Examiner.

Further, the M.P.E.P. expressly states that a serious burden is placed upon the examiner in establishing *prima facie* restriction. Specifically, §803 states that the burden may be overcome by appropriate explanation of separate classification, separate status in the art, or a different field of search, none of which have been addressed by the current restriction requirement. Thus, reconsideration withdrawal of the restriction requirement is respectfully requested.

Applicants submit that all matters set forth in the Office Action have been addressed. Accordingly, it is believed that all claims are in condition for allowance. Favorable consideration and an early indication of allowability are respectfully requested.

Should the Examiner deem that an interview with Applicants' undersigned attorney would expedite the disposition of this application, the Examiner is encouraged to call the undersigned attorney at the telephone number indicated below.

Respectfully submitted,



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